

HIPAA ACTIVITY UPDATE

Department of Health

State's major health information repository
DOH covers more than 250,000 licensed providers
Medicaid relationships are primarily impacted
Agency wide compliance with Privacy and security likely
Working with local health agencies to build networks and share info.

Labor and Industries

State worker compensation program is excluded L&I is voluntarily complying to be consistent with other payers L&I business partners (Providers) are compelled to comply Completed supplemental budget Beginning implementation; convening internal Privacy workgroups Work plans updated with new timelines

Department of Social and Health Services

DSHS is largest health plan in the state (Medicaid, State-funded programs)
DSHS is also a health-care provider (State Hospitals, Residential Facilities)
All Administrations have covered programs, 23 information systems impacted Policy and legal analysis for transaction specific requirements underway Participating in National Workgroups and Provider and Government Outreach Developing Privacy Rule Work Plan

Budget Request / Feasibility Study Underway

Assessing compliance options for Transactions

- Segregate short and long term strategies
- Upgrade system for HIPAA compliance
- Migrate non-compliant system to compliant system
- Hire a clearinghouse
- Change business model

Health Care Authority

HCA Insurance Information System must be compliant HCA also performs health plan functions for Uniform Medical Plan Assessment underway

Department of Corrections, Office of Superintendent of Public Instruction, and others may also be impacted.



GETTING STARTED

Appoint a taskforce, or appropriate oversight authority

- Look to existing structure
- Consider complimentary and strategic initiatives
- Look for opportunities

Assign project team or individual

- Consider technical, business, policy, and legal implications
- Need protected time

Get involved

- Attend outreach initiatives, and local coalition meetings
- Form smaller coalitions based on affiliation
 - o County areas, Tribal areas, or interest areas (mental health, aging, etc.)
- Build contact base
- Join listservs on HIPAA or visit websites

Focus on assessment

- Covered entity status
- Program impacts
- Indirect impacts (data flow, business partners, etc)

Build on available tools, resources, and experience

- Each entity is unique and must do own analysis but,
- Many tools and resources are already available to assist
- Tools on DSHS Website include:
 - Impact Assessment tool
 - o Transaction Descriptions and Questions
 - Interaction Model
 - Privacy Entity Analysis
 - Privacy Law Matrix
 - o Privacy Assessment/Implementation Areas